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Department of Internal Affairs

SimplifyingLocalGovernment@dia.govt.nz

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154

ccc.govt.nz

Christchurch City Council submission on the *Simplifying Local Government Proposal*

Introduction

1. Christchurch City Council (the Council) supports the Government's intent to simplify local government, reduce duplication, and improve regional performance and long-term outcomes. The Council agrees that a more integrated, evidence-led approach to how functions are delivered across Canterbury is timely, necessary, and has the potential to deliver real benefits for communities and ratepayers.
2. Current arrangements create unnecessary complexity, duplication, and misalignment across functions that increasingly operate across district boundaries. In practice, service outcomes are often shaped by fragmented planning, inconsistent capability, and unclear accountability across agencies and councils. A structured review of what functions are delivered, how well they are performing, and where they are best placed to deliver strong outcomes over the long term is a sensible and overdue step. If done well, this reform could materially improve service quality, resilience, accountability, and value for money.
3. However, the success of the proposal will depend less on its ambition than on the credibility of the process and the settings that support it. From the Council's perspective, the greatest risks lie not in the overall intent, but in whether the proposed machinery genuinely enables reform rather than defaulting to status quo management. In particular, there are material risks associated with:
 - a. the design and operation of the Combined Territories Board (CTB) as a transitional decision-making body,
 - b. the integrity, independence, and flexibility of the Regional Reorganisation Plan (RRP) process, and
 - c. whether the framework properly recognises the realities of a major metropolitan centre and enables Greater Christchurch-scale analysis and solutions where functions clearly operate at that level.
4. Accordingly, this submission advocates for a reform process that is robust, independent, and flexible, and that can identify the best option based on clear evidence. The Council supports a process that enables genuine consideration of metropolitan-scale and unitary options early

and in depth, where functional analysis demonstrates that these models could deliver better outcomes, rather than defaulting to region-wide solutions.

5. This submission should be read alongside a separate, attached document that responds directly to the consultation questions set out in the draft proposal. Together, these documents reflect the Council's commitment to engaging constructively and contributing to a reform process that is robust, flexible, and capable of delivering durable improvements in performance, resilience, and value for ratepayers across Canterbury.

Submission

Christchurch Context and Role in Canterbury

6. Christchurch is New Zealand's second-largest city and the South Island's primary metropolitan centre. It is the economic, population, and infrastructure heart of Canterbury, and plays a national role as the South Island's principal gateway for trade, transport, education, health services, and innovation. Decisions about how functions are governed and delivered in Christchurch therefore have implications that extend beyond the city and the Canterbury region.
7. Christchurch has the largest share of Canterbury's population and is expected to experience most of the region's future growth. These growth pressures affect where people live and how the wider system functions, placing ongoing demand on transport networks, water and stormwater systems, land-use planning and consenting, housing delivery, and climate-resilience measures. As a metropolitan centre, many services and systems operate at scale, across district boundaries, and with interdependencies that differ materially from those in smaller or predominantly rural districts.
8. Christchurch also has the region's largest and most complex infrastructure and asset networks, and as a result, faces a materially higher share of infrastructure investment requirements, renewal demand, and operational risk. These asset networks are critical not only for city residents but for the functioning of the wider Canterbury economy and the region's ability to support growth and recovery from hazards.
9. In addition, Christchurch faces significant hazard and resilience pressures, including flood and catchment risk, coastal erosion and sea-level rise, climate adaptation challenges, and the long-term impacts of seismic events on infrastructure and urban form. The city and wider region also face ongoing water management and water-quality challenges across stormwater, wastewater, drinking water infrastructure, and receiving environments, which require coordinated infrastructure investment, regulatory oversight, and catchment-scale planning across councils and agencies. Managing these pressures effectively requires integrated planning, strong technical capability, and governance arrangements able to operate at metropolitan and catchment scales.
10. Taken together, these factors mean decisions about how Christchurch is governed and how services are delivered have a significant impact on Canterbury's productivity, resilience, and long-term growth. Reform outcomes that work for Christchurch are therefore central to the success of reform across the region as a whole.

11. For these reasons, any reform approach that treats all councils the same risks making decisions that don't reflect how the metropolitan area actually functions. A one-size-fits-all approach will not reflect the pace, scale, and complexity of metropolitan systems, or the way key functions such as transport, growth management, infrastructure sequencing, and climate resilience operate across Greater Christchurch.

Acknowledging the Government's Intent

12. The Council supports the Government's objectives to reduce duplication, improve alignment across functions, strengthen long-term performance and resilience, and improve value for money for New Zealanders. We agree the current system, characterised by overlapping responsibilities, fragmented decision-making, and inconsistent capability across councils, does not consistently deliver the outcomes communities expect or represent the best use of public resources.
13. We consider the proposal's emphasis on a functional review to be methodologically sound. Starting with a clear assessment of what functions are required, how they are currently delivered, how well they are performing, and at what scale they are best placed provides a stronger foundation for reform than approaches that begin with predetermined structural models. In this respect, *function first, form second* is the right framing. We would welcome the opportunity to engage with your officials now to help inform the structure and methodology of the functional review being undertaken by the Department of Internal Affairs before the establishment of the CTB's.
14. If designed and implemented well, the proposal could create a practical pathway to:
 - a. a shared evidence base across councils,
 - b. clearer accountabilities and fewer fragmented decision points,
 - c. better coordination of planning, investment, and delivery across growth, infrastructure, and resilience challenges, and
 - d. improved value for money through reduced duplication and better use of capability.
15. The Council also sees value in the intent to encourage councils to work more collaboratively across boundaries where services and systems already operate beyond individual districts. However, the relevance and effectiveness of pan-regional collaboration will vary by function. Across greater Christchurch, many critical functions already operate at metropolitan scale, with levels of demand, complexity, and integration that differ materially from wider regional contexts. The reform framework therefore needs to explicitly enable metropolitan-scale analysis and delivery pathways alongside region-wide collaboration, rather than assuming a single regional approach will be appropriate in all cases.
16. While the submission identifies several concerns about how the proposal may operate in practice, these should be read as constructive and forward-looking. The Council's objective is to help ensure the intent of the reform is realised through credible settings and practical

mechanisms, rather than diluted through process design, transitional constraints, or default institutional approaches.

Ensuring the governance model can deliver the intended outcomes

17. While the Council supports the outcomes the proposal is seeking to achieve, we are not yet persuaded that the CTB model, as currently proposed, is the most effective way to deliver those outcomes in practice for a complex and highly differentiated region such as Canterbury.
18. The intent of the reform is clear: to enable a more integrated, evidence-led assessment of how functions are delivered, reduce duplication, and improve long-term performance and value for communities. Achieving this intent requires governance arrangements that are purpose-built for system redesign, sufficiently focused and well-resourced, and capable of driving a rigorous functional review.
19. As proposed, the CTB would be required to perform two substantial roles simultaneously:
 - a. governing the full suite of existing regional council functions; and
 - b. leading a once-in-a-generation redesign of how local government functions are delivered across the region.
20. The Council considers this combination to be a material weakness in the current proposal. Bringing these roles together within a single, mayor-led transitional body risks constraining capacity, diluting focus, and reducing the independence required to undertake a genuinely performance-led review at the scale and depth required. This is further compounded by the reality that mayors would be expected to undertake this work alongside their primary responsibilities leading their own councils, communities, and organisations, which may limit the time and capacity available to support a complex regional reform process.
21. The Council's view is that elected regional councillors should remain in place to govern existing regional council functions until a new governance and delivery model is confirmed and ready for implementation at the next local government election. This position is contingent on the reform process progressing at sufficient pace, with appropriate capability, support, and legislative settings in place to enable the functional review and RTP to be completed within that timeframe.
22. This would allow the CTB (or equivalent transitional body) to focus on leading the functional review and development of the Regional Reorganisation Plan, rather than attempting to simultaneously govern ongoing regional council operations. Separating these responsibilities would strengthen focus, reduce transition risk, and better support the reform's objectives.
23. Additionally, the Government has signalled that CTBs are expected to act as the decision-making body during the transition period proposed by the Planning and Natural Environment Bills. There is currently a lack of clarity around the relationship between the CTB and the resource management reform process. Given the timeframes, scope, and scale of these responsibilities, the Council is concerned about the cumulative demands placed on the CTB

during the transition period. We expand on this concern in our submissions on resource management reform.

24. More broadly, transitional governance and advisory arrangements should be designed to enable differentiated workstreams at the scale systems actually operate. In Canterbury, this includes metropolitan-scale analysis where functions are highly interdependent and operate across district boundaries. Without this flexibility, there is a risk that region-wide governance structures smooth over material differences in scale, complexity, and performance.
25. The Council notes its long-standing experience working collaboratively at metropolitan scale across Christchurch, Selwyn, and Waimakariri, which provides a practical foundation for future functional analysis without pre-judging outcomes. The Council also reiterates that it has previously expressed interest in the potential merits of a unitary authority model for Christchurch, reflecting the need to address complexity, duplication, and misaligned accountability where functions operate at metropolitan scale. While no single structural outcome is advocated through this submission, it is important that the reform framework does not, through its transitional design, foreclose consideration of metropolitan or unitary options where the evidence supports them.
26. Accordingly, the Council encourages the Government to reconsider the design and composition of the proposed CTB and to retain flexibility in how transitional governance, advisory, and analytical functions are structured. In our view, the ultimate success of the reform will depend less on the existence of a single transitional body and more on whether governance, delegation, and support arrangements enable a focused, independent, and evidence-led functional review.
27. This perspective underpins the concerns and suggestions set out below, which are intended to strengthen the likelihood that the reform delivers durable improvements in performance, accountability, and value for Canterbury communities.

Key Concerns with the Proposed Approach

The CTB's Transitional Role and Decision-Making Dynamics

28. The proposal positions the CTB as a transitional governance mechanism. In practice, the CTB would be required to operate at the centre of two substantial and demanding roles at the same time: governing the full suite of existing regional council functions, and leading a complex, future-focused reorganisation process intended to reshape how local government functions are delivered across the region.
29. This dual role creates a material risk of capacity and focus being stretched. The reorganisation task is inherently complex, involving system-wide functional analysis, performance and cost assessment across councils, engagement with mana whenua and communities, testing alternative delivery models, and developing evidence-based recommendations that may challenge existing institutional arrangements. At the same time, the CTB would be required to continue discharging ongoing statutory governance responsibilities, including during the transition to the new resource management framework

which also needs to be bedded in. There is a real risk that day-to-day governance demands could constrain the depth, pace, and independence of the reform work.

30. For this reason, the Council reiterates its view that elected regional councillors should remain in place to govern existing regional council functions until any new governance model is confirmed and ready for implementation at the next local government election (conditional on the reform process progressing at sufficient pace to enable the functional review and RRP to be completed within that timeframe).
 31. Maintaining continuity of regional governance would reduce transition risk and allow the CTB (or equivalent transitional body) to focus on leading the functional review and development of the RRP.
 32. Delivering a credible RRP will also require capability beyond traditional governance functions. The Council considers the reform process will require the CTB to have strong expertise in:
 - a. system design and institutional reform
 - b. infrastructure planning and finance
 - c. regulatory systems and performance
 - d. organisational transition and implementation
 - e. public-sector performance evaluation
 - f. data-driven functional analysis
 - g. Māori and Mana Whenua representation
 33. The effectiveness of the CTB will also depend heavily on the strength of the supporting machinery, including secretariat capability, decision-making and delegation arrangements, and the ability to establish and empower structured functional review workstreams. In particular, the CTB must be able to delegate substantive analytical and design work, rather than attempting to manage the reform process primarily through the board table.
 34. If appropriate enabling settings are not in place, there is a risk the reform process becomes overly cautious and incremental, resulting in modest changes and negotiated compromise rather than genuine reform. The Council considers it essential that transitional governance arrangements support clear strategic direction, timely decision-making, and a focused, evidence-led functional review, supported by dedicated capability to undertake detailed analysis and option development at pace.
- Risk of Negotiated Compromise Rather Than Performance-Led Reform*
35. Without strong safeguards, the Regional Reorganisation Plan risks evolving into a negotiated settlement between councils rather than an evidence-led assessment of what will perform best over the long term.

36. Regional reorganisation is inherently complex and politically sensitive. Councils bring different scales, pressures, financial positions, and community expectations. If the process relies heavily on consensus within the CTB, outcomes may gravitate toward what is collectively acceptable rather than what delivers the strongest performance, resilience, and value for money.
37. This risk is heightened by the CTB's composition. Mayors are accountable first and foremost to their own communities, which can create natural incentives to protect existing arrangements or resist changes perceived to disadvantage local interests. Without a strong analytical base, independent advice, and clear evaluation frameworks, reform ambition may be diluted.
38. The Council is particularly concerned that lowest-common-denominator outcomes could disproportionately disadvantage metropolitan systems. Major urban centres carry higher infrastructure complexity, growth pressures, and risk exposure, and often require differentiated solutions. A process that defaults to uniform, region-wide compromise risks locking in arrangements that underperform for both metropolitan and regional communities.
39. For these reasons, the RRP must be designed to prioritise evidence over negotiation, including:
 - a. clear and practical functional assessment criteria,
 - b. transparent evaluation of options against performance, cost, capability, resilience, and outcomes,
 - c. the ability to identify and progress differentiated solutions where appropriate, and
 - d. decision-making settings that allow difficult but necessary conclusions to be reached.

Representation and Voting Settings

40. The Council is concerned that CTB voting and representation settings could underweight metropolitan scale and load, particularly if “effective representation” adjustments materially reduce the influence of the largest population centre.
41. While effective representation of communities of interest is important, the voting design must not inadvertently produce gridlock, systematically dilute metropolitan needs, or weaken the CTB's capacity to make timely, high-quality decisions on complex regional issues. The voting framework must be transparent, clearly justified, and demonstrably aligned with the objectives of the reform.
42. In the Council's view, the model must recognise that population concentration, infrastructure demand, and system risk are not evenly distributed across Canterbury. The governance settings need to reflect this reality if the reform is to improve outcomes rather than entrench existing misalignment.

43. Given the significance of these changes, we also strongly recommend allowing territorial authorities to pause any representation reviews that they may currently be required to undertake. Representation reviews are required to consider issues that are going to be unknown during a period of structural reform. Holding them concurrently with the local government simplification work creates duplication, will confuse the public and overload councils. We urge the Government to include relevant amendments to the Local Electoral Act, as part of its legislative work on local government simplification, to enable territorial authorities to pause any representation reviews they are currently required to undertake.

Independence and Credibility of the Secretariat

44. The effectiveness and legitimacy of both the CTB and the RRP will depend heavily on the design and credibility of the supporting secretariat. It is important that the secretariat arrangement is neutral, trusted, and fit for purpose, with strong analytical capability and access to reliable, comparable data across councils.
45. This requirement applies regardless of whether elected regional councillors remain in place to govern existing regional council functions during the transition period. Even if regional governance responsibilities continue to sit with elected regional councillors, the CTB (or equivalent transitional body) will require a dedicated, high-capability secretariat to support the functional review, option development, and preparation of the RRP.
46. For Canterbury in particular, it will be important that the functional review and RRP work is not perceived as being facilitated, led, or owned by any single existing institution. Independence in practice, and independence in perception, will materially affect confidence in the outputs among councils, mana whenua, the public, and central government.
47. The Council does not consider the current Mayoral Forum secretariat to be an appropriate vehicle for this role. Its real or perceived alignment with regional council priorities, outcomes, and agendas could undermine the independence required for a credible and trusted process. Instead, the Council expects a bespoke, properly resourced secretariat arrangement to be established to support the CTB and functional review process, while existing regional council secretariat functions continue to support elected regional councillors in governing ongoing regional council operations during the transition period. Ensuring a separate and genuinely independent (or cross council) secretariat is essential to maintaining confidence in the process among councils, mana whenua, the public, and central government.

Council's Expectations of the RRP Process

The RRP Must Be a True Functional Review

48. The RRP must begin with comprehensive, region-wide functional mapping and performance assessment, including cross-boundary district functions where relevant. This should identify where delivery is fragmented, where capability is duplicated, where outcomes are inconsistent, and where coordination failures produce unnecessary cost or risk.
49. The process must be capable of producing a range of solutions, rather than forcing a single uniform structure across all functions. Christchurch does not support an approach that

assumes one governance model will suit all functions. Instead, the review should identify the most effective delivery model for each function based on evidence.

50. Different functions may be best delivered at different scales, including metropolitan, sub-regional, regional, shared-service, or national, and the process should be explicitly designed to identify the right scale for each, rather than defaulting to region-wide solutions.

Enable Metropolitan Workstreams and Sub-Regional Analysis

51. The proposal should explicitly enable the CTB to establish and empower sub-regional workstreams (including a greater Christchurch grouping) where functions naturally operate at that scale. For Canterbury, this is particularly relevant for growth planning, transport integration, infrastructure sequencing, climate adaptation, and related service delivery interfaces.
52. Without this flexibility, one of the clearest opportunities for improving performance and reducing duplication, metropolitan alignment across Christchurch, Selwyn, and Waimakariri, risks being constrained by region-wide compromise rather than addressed on its merits. Enabling greater Christchurch workstreams is not about pre-empting outcomes; it is about ensuring the functional review reflects how systems actually operate and can test delivery options at the scale that matters.
53. Through this process we can consider options that include the current greater Christchurch model. The *Greater Christchurch Partnership* has enabled collaborative work with Government agencies and the three territorial authorities, as well as other partners, for nearly 20 years. Over that time, we have seen the benefits of working at a metro scale to inform future decision making. We have also previously stated our desire to become a Unitary Authority to achieve the same benefits from working at scale.
54. Any process should enable the consideration of either a single Unitary Authority for the city or a super city solution based on the work already done through the Greater Christchurch Partnership.

Momentum and the Risk of Long Timelines

55. The indicative sequencing raises a practical concern. If the CTB is not in place until 2027, and the RRP is then developed over up to two years, Canterbury risks losing momentum at precisely the time clear direction and clarity are needed. Prolonged uncertainty about future governance and delivery arrangements can affect investment decisions, organisational capability, workforce stability, and long-term planning across councils and partner agencies. From the Council's perspective, the reform process must maintain momentum and provide clarity within a reasonable timeframe to mitigate these risks.
56. The process should actively enable early functional review work to begin before CTB establishment, including shared data baselines, agreed functional catalogues, and staged analytical workstreams. Early work would strengthen the evidence base, reduce downstream risk, and support a more confident and efficient reorganisation process once formal structures are in place.

57. If regional councillors remain in place to continue governing existing regional council functions during the transition period (as per our earlier recommendation), the Council expects the Government to actively enable early functional review work and ensure the legislative, governance, and capability settings are in place to progress the RRP at pace, so that a new governance and delivery model can be confirmed and ready for implementation prior to the next local government election. This would help minimise transition risk, provide certainty to communities and staff, and ensure reform momentum is maintained.

Mana Whenua, Treaty Settings, and Māori Outcomes

58. The Council expects that partnership with mana whenua is embedded from the outset in the functional review design, not added late as a governance overlay. Treaty partnership should shape how functions are assessed, how outcomes are defined, and how decision-making settings are designed.

59. A design informed by an understanding of intergenerational impacts, cultural landscapes, and system-wide relationships across environmental, infrastructure, and planning functions will help with risk management at an operational level and mitigate the need for future retrospective correction as political climates change.

60. Any transitional arrangements should not inadvertently weaken existing Canterbury settings, including current representation arrangements for Mana Whenua through the Ngāi Tahu Settlement Act and established partnership mechanisms. The removal of elected regional councillors should not result in reduced Māori voices, influence, or decision-making at regional or sub-regional levels. This risks the CTB defaulting to advisory-only Māori input, threatens transitional legitimacy, and slows decision-making through conflict.

61. The RRP must demonstrate how Treaty settlement commitments administered by council will be upheld, and how Māori outcomes and kaitiakitanga are supported across environmental, infrastructure, and planning functions.

62. Māori communities will have an important role in supporting and giving effect to both Māori and kaitiakitanga outcomes. When Māori outcomes are weakly articulated or inconsistently applied, there is an increased risk that simplification prioritises administrative efficiency over durable, place-based outcomes, slowing decision-making and eroding trust.

Costs, Funding, and Avoiding Unfunded Mandates

63. Transition costs must be identified early, quantified realistically, and supported by clear funding mechanisms. These costs should not be underestimated or left to ratepayers without open and clearly explained support arrangements, including how costs will be shared, who will fund what, and how central government requirements will be backed financially. Even where reform delivers long-term benefits, the transition itself will require investment in analysis, capability, organisational change, and implementation, and this will have cost implications for councils and ratepayers. This is particularly important in the current fiscal environment, including proposed rates-capping settings and increasing infrastructure funding pressures. Reform implementation must not create unfunded mandates or shift transition costs to ratepayers without clear justification and agreed funding arrangements.

64. The Council is particularly concerned to avoid outcomes where reform results in unfunded mandates, hidden cost transfers, or opaque cross-subsidisation that is not justified by demonstrable regional benefit. As the region's largest ratepayer base and the metropolitan centre with the most capital-intensive infrastructure systems, Christchurch rate payers cannot be expected to absorb the costs of historic underinvestment or structural deficits elsewhere in the region without a clear rationale and explicit agreement. This includes recognising that undertaking the functional review, developing the RRP, and implementing any new delivery arrangements will require real and sustained capability investment across the system. These activities will carry material costs for councils and ratepayers, and it is essential that transition costs, capability requirements, and any changes to service delivery responsibilities are transparently funded and aligned with the principle that funding should follow function.
65. Any final arrangements must demonstrate a clear value proposition and affordability pathway for Christchurch ratepayers, with long-term impacts tested and evidenced rather than assumed. In particular, the Government should clearly articulate how transition and implementation costs will be managed alongside broader fiscal constraints, including potential rates-capping settings, so councils and communities have confidence that reform ambition is matched by realistic funding pathways.

What Success Looks Like

66. From Christchurch's perspective, a successful reform process would deliver:
- a. A genuine, evidence-led functional review that provides a clear view of what functions are required across Canterbury, how they are currently performing, and where they are best placed to deliver outcomes – without being constrained to a single predetermined structural model.
 - b. Governance and delivery arrangements capable of timely, high-quality decisions, with representation and voting arrangements that reflect scale and impact appropriately and avoid embedding lowest-common-denominator outcomes.
 - c. Explicit provision for Greater Christchurch (metropolitan) analysis and solutions, recognising that many of the region's most complex growth, infrastructure, transport, and climate challenges operate at metropolitan scale and cannot be effectively addressed through region-wide compromise alone.
 - d. Enduring Treaty partnership arrangements, embedded from the outset, protecting existing commitments and strengthening Māori outcomes and kaitiakitanga across environmental, infrastructure, and planning functions.
 - e. Clear and credible implementation pathways, including transparent treatment of costs, funding that follows function, avoidance of unfunded mandates or unjustified cross-subsidisation, and realistic transition planning that protects ratepayers.

67. If these conditions are met, the Council is confident the reform can deliver durable improvements in service performance, resilience, and accountability, supporting regional prosperity while delivering value for Canterbury communities and Christchurch ratepayers over the long term.

Conclusion

68. Christchurch City Council supports the direction of reform and agrees that simplifying local government presents an opportunity to improve how functions are delivered across Canterbury. However, the success of this reform will depend less on structural ambition and more on whether the process is credible, independent, flexible, and genuinely evidence-led.

69. The Council considers it essential that the Regional Reorganisation Plan operates as a genuine functional review, enables differentiated solutions where warranted, and avoids defaulting to negotiated compromise or one-size-fits-all outcomes. The reform must explicitly allow for metropolitan-scale analysis and delivery pathways, protect and strengthen Treaty partnerships, and ensure that costs, funding responsibilities, and transition impacts are transparent and fair for ratepayers.

70. The Council is committed to engaging constructively and in good faith. We are prepared to invest capability, share evidence, and play a leadership role in building a shared regional understanding of what works best. Our objective is not to pre-determine outcomes, but to ensure the process is strong enough to identify them properly.

71. If the process is right, the Council is confident the reform can deliver durable, high-quality outcomes that strengthen regional performance, support growth and resilience, and provide lasting value for Canterbury communities now and into the future.

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact Luke Adams, Principal Advisor Strategic Policy: Luke.Adams@ccc.govt.nz.

Ngā mihi,



Phil Mauer

Mayor of Christchurch